

53 NGOs and civil society organisations call on EU policy makers to agree to more ambitious car and van CO2 targets for the environment, consumers and Europe's energy independence

30 May 2022

Dear Members of the European Parliament,

Passenger cars and light commercial vehicles are responsible for 15% of all Europe's carbon dioxide (CO2) emissions and are the single largest source of toxic nitrogen dioxide pollution, which cuts short the lives of over 40,000 Europeans every year.¹

Following the invasion of Ukraine, European reliance on Russian oil has also been thrown into stark relief. Cars consume around a third of all oil imports Europe gets from Russia, which amounted to €17 billion's worth in 2021 alone. Electric cars consume zero oil, and so are a key structural measure to wean Europe off its oil habit. Every new petrol or diesel car sold prolongs our dependence on fossil fuel and makes it more and more difficult for Europe to meet its own climate targets, let alone the 1.5°C limit of the Paris Agreement.

As EU policy makers, you have the opportunity - via the revision of the EU CO2 standards for cars and vans - to decide how quickly Europe transitions away from the combustion engine and towards an affordable emission-free mobility, with all the additional benefits that will bring for the environment, drivers, and public health. Along with fewer private car journeys and a more efficient and shared mobility system, this is one of the key solutions to achieving zero emission road transport.

Electric cars (EVs) are already the cheapest option for drivers on a total cost of ownership basis, but as they are still produced in relatively small numbers - just enough to allow car makers meet the CO2 targets until now - they are still expensive for most consumers. Carmakers moving to mass production of EVs - driven by more ambitious targets in 2025 and 2027 - can ensure they are cheaper to buy on average than petrol equivalents by the middle of this decade.

As environmental/consumer NGOs representing 51 organisations from 12 countries across Europe...

- *to ensure Europe has a fighting chance to tackle climate change and makes its fair contribution towards meeting the 1.5°C limit of the Paris Agreement;*
- *to help clean up the air in our cities where around 90% of city dwellers are exposed to pollution levels deemed harmful to human health;*
- *to end our fossil dependence and stop sending millions of euros a day to the Kremlin;*

...we call on you to:

1. Support an **EU-wide phase-out date for sales of new internal combustion engine passenger cars and vans (including plug-in hybrids) by setting a 100% CO2 reduction target as close to 2030 as possible but no later than 2035 for all EU countries.** This will

¹ EEA, (2021, 12, 01) [Air Pollution: how it affects our health](#).

enable all cars and vans on the road to be zero emission by 2050 - the bare minimum for Europe to be on track to meet its climate neutrality obligations by that date.

2. **Put in place much more ambitious short and mid-term CO2 targets** to ensure carmakers deliver on their EV promises and enable member states to reach their proposed national climate goals by 2030. Leaving the current proposed targets as they are until 2030 means passenger car transport will make virtually no contribution to the EU's overall 2030 climate target of -55% GHG emissions – forcing other sectors to achieve significantly larger emission cuts. Continued scale up of EVs during the 2020s will also promote a thriving second-hand market. To this end, policy-makers should introduce **significantly higher CO2 reduction targets in both 2025 and 2030**, with an additional interim **target of at least 45% in 2027**, putting carmakers on a clear path to zero emissions.
3. **Reject fake solutions being pushed by the oil and gas industry that would allow carmakers to buy fuel credits to comply with their CO2 targets.** Producing synthetic petrol & diesel is far less efficient than using electricity to power electric vehicles and supplying just 10% of new cars with e-fuels instead of electrifying them will require 23% more renewable electricity generation in Europe. Pushing expensive e-fuels in cars will also just push up costs for drivers - with [analysis](#) finding that running a car on e-fuels over five years will cost a driver €10,000 more than running a battery electric car. As drafted, the proposed amendment also risks boosting unsustainable biofuels – in particular crop-based fuels which, unlike e-fuels, are cheap and available today. The limited amounts of synthetic fuels should instead be prioritised for planes and ships, which today burn fossil fuels and do not have a technology alternative. Finally, mixing fuels into legislation regulating engines will lead to an unenforceable law - it will simply not be feasible to monitor what drivers put in their cars over the lifetime of an e-fuel credited car, creating a significant loophole in the regulation.
4. **Stop giving carmakers credits for cars they have to produce anyway and remove the zero- and low-emission vehicle (ZLEV) benchmark as of 2025.** Under the ZLEV crediting system, which is currently set to apply from 2025, carmakers' emission targets are relaxed if their share of zero- and low-emission vehicle sales exceeds the voluntary 15% benchmark. Carmakers already need to sell EVs to meet their targets anyway and if the benchmark system is maintained, car makers can use these credits to water down the already weak CO2 target by a further 5%. The current 2025 CO2 target of 15% is so weak that it already requires almost no additional effort by carmakers from where they are today until 2029. The ZLEV bonus therefore significantly weakens the CO2 standards, giving manufacturers a free license to sell additional high-emitting vehicles.
5. **End the free CO2 pass for heavier cars by removing the mass adjustment factor.** Under the current regulation, carmakers that sell heavier premium cars (and the wealthier drivers who can afford to buy them) are allowed to emit more CO2, via the so-called mass-adjustment of carmaker CO2 targets. This loophole is not justifiable on climate, social justice, or technological grounds and is one of the principal reasons for the surging sales of heavy and highly-polluting SUVs across Europe.

Signed by:

1. 2celsius - Romania
2. Associazione Italiana Difesa Consumatori e Ambiente (Adiconsum) - Italy
3. Altroconsumo - Italy
4. Associació per a la Promoció del Transport Públic (PTP) - Spain
5. ATE Swiss Association for transport and environment - Switzerland
6. Bellona Europa - EU
7. BondBeterLeefmilieu - Belgium
8. C40 Cities - Global
9. Climate Action Network - EU
10. The Climate Group - Global
11. Cittadini per l'Aria - Italy
12. Clean Air Action Group (Levegő Munkacsoport) - Hungary
13. Clean Cities Campaign - EU
14. Deutsche Umwelthilfe (DUH) - Germany
15. ECCO Think Tank - Italy
16. Ecodes - Spain
17. Environmental Coalition on Standards (ECOS) - EU
18. European Environmental Bureau (EEB) - EU
19. European Public Health Alliance (EPHA) - EU
20. Focus Association for Sustainable Development - Slovenia
21. Fridays for Future Italia - Italia
22. Fundación Alternativas - Spain
23. Fundación Renovables - Spain
24. Fundacja Promocji Pojazdów Elektrycznych (FPPE) - Poland
25. Inter-Environnement Wallonie (IEW) - Belgium
26. Instytut Spraw Obywatelskim - Poland
27. Instytut Zielonej Gospodarki (IZG) - Poland
28. Instytut na rzecz Ekorozwoju - Poland
29. Koalicja Klimatyczna - Poland
30. Kyoto Club - Italy
31. Legambiente - Italy
32. Naturschutzbund Deutschland e.V. (NABU) - Germany
33. Ingeniería para el desarrollo humano (ONGAWA) - Spain
34. Polska Alarm Smogowy - Poland
35. Polska Zielona Sieć - Poland
36. Polski Klub Ekologiczny Okręg Mazowiecki (PKE OM) - Poland
37. Polski Klub Ekologiczny Okręg Pomorski (PKE OM) - Poland
38. Pracownia na rzecz Wszystkich Istot - Poland
39. Associação Nacional de Conservação da Natureza (Quercus ANCN) - Portugal
40. Réseau Action Climat (RAC) - France
41. Respire (Association Nationale pour l'amélioration de la qualité de l'air) - France
42. Rinascimento green - Italy
43. Salvia - Spain
44. Sbilanciamoci - Italy
45. Stowarzyszenie Ekologiczne EKO-UNIA - Poland

- 46. Stowarzyszenie Ekologiczno-Kulturalne "Wspólna Ziemia" - Poland
- 47. SumOfUs - Global
- 48. Transport & Environment (T&E) - EU
- 49. Verkehrsclub Deutschland (VCD) - Germany
- 50. Verkehrsclub Österreich (VCÖ) - Austria
- 51. Warszawski Alarm Smogowy - Poland
- 52. Zero - Portugal
- 53. Zielone Mazowsze - Poland





réseau
action
climat
france

RINASCIMENTO GREEN

Salvia



Sum
Of
Us

TRANSPORT &
ENVIRONMENT

VCD 
Mobilität für Menschen.

VCO 
MOBILITÄT MIT ZUKUNFT

 **Warszawski
Alarm Smogowy**

ZERO 
associação sistema terrestre sustentável



BELLONA
EUROPA

 *Respire*
Association nationale
pour l'amélioration
de la qualité de l'air